

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DEBORAH FRAME-WILSON, *et al.*, on behalf
of themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:20-cv-00424-JHC

STIPULATED MOTION AND
ORDER REGARDING DISCOVERY
SCHEDULE

ELIZABETH DE COSTER, *et al.*, on behalf of
themselves and all other similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:21-cv-00693-JHC

CHRISTOPHER BROWN, *et al.*, on behalf of
themselves and all others similarly situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware corporation,

Defendant.

No. 2:22-cv-00965-JHC

The parties, by and through their counsel, have agreed and stipulated as follows:

1. The Court ordered that “the discovery deadline in the three above-captioned cases” be aligned “with the discovery deadlines in cases brought by governmental plaintiffs—*California v. Amazon.com, Inc.*, No. CGC-22-601826 (Cal. Super. Ct.) (CA AG) and *FTC v. Amazon.com, Inc.*, No. 2:23-cv-01495-JHC (W.D. Wash.) (FTC).” *See Frame-Wilson* Dkt. No. 172.
2. The Court’s order identified the close of discovery as August 8, 2025. *Id.* In the FTC case, however, the Court subsequently extended the fact discovery deadline to October 22, 2025. Consistent with the Court’s intent, the parties agree that the deadline for fact discovery in the above-captioned cases is also October 22, 2025.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the parties, through their undersigned counsel of record, and the parties ask the Court to order that:

1. The deadline for fact discovery in the above-captioned cases is October 22, 2025.

DATED July 22, 2025.

Respectfully submitted,

HAGENS BERMAN SOBOL SHAPIRO LLP

By: /s/ Steve W. Berman

Steve W. Berman (WSBA No. 12536)

By: /s/ Barbara A. Mahoney

Barbara A. Mahoney (WSBA No. 31845)

1301 Second Avenue, Suite 2000

Seattle, WA 98101

Telephone: (206) 623-7292

Facsimile: (206) 623-0594

E-mail: steve@hbsslaw.com

barbaram@hbsslaw.com

Anne F. Johnson (*pro hac vice*)

594 Dean Street, Suite 24

Brooklyn, NY 11238

Telephone: (718) 916-3520

E-mail: annej@hbsslaw.com

KELLER POSTMAN LLC

Zina G. Bash (*pro hac vice*)
111 Congress Avenue, Suite 500
Austin, TX, 78701
Telephone: (512) 690-0990
E-mail: zina.bash@kellerpostman.com

Jessica Beringer (*pro hac vice*)
Alex Dravillas (*pro hac vice*)
Shane Kelly (*pro hac vice*)
150 North Riverside Plaza, Suite 4100
Chicago, Illinois 60606
Telephone: (312) 741-5220
E-mail: Jessica.Beringer@kellerpostman.com
E-mail: ajd@kellerpostman.com
E-mail: shane.kelly@kellerpostman.com

*Interim Co-Lead Counsel for Plaintiffs and the
proposed Class*

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

By: /s/ Alicia Cobb
Alicia Cobb, WSBA # 48685
1109 First Avenue, Suite 210
Seattle, WA 98101
Telephone: (206) 905-7000
Email: aliciacobb@quinnemanuel.com

Steig D. Olson (*pro hac vice*)
David D. LeRay (*pro hac vice*)
Nic V. Siebert (*pro hac vice*)
Maxwell P. Deabler-Meadows (*pro hac vice*)
Elle Mahdavi (*pro hac vice*)
295 Fifth Ave.
New York, NY 10016
Telephone: (212) 849-7000
Email: steigolson@quinnemanuel.com
Email: davidleray@quinnemanuel.com
Email: nicolassiebert@quinnemanuel.com
Email: maxmeadows@quinnemanuel.com
Email: ellemahdavi@quinnemanuel.com

Adam B. Wolfson (*pro hac vice*)
865 South Figueroa Street, 10th Floor
Los Angeles, CA 90017-2543
Telephone: (213) 443-3000
Email: adamwolfson@quinnemanuel.com

*Interim Executive Committee for Plaintiffs and the
proposed Class*

DAVIS WRIGHT TREMAINE LLP

By /s/ John A. Goldmark
John A. Goldmark, WSBA # 40980
MaryAnn Almeida, WSBA #49086
920 Fifth Avenue, Suite 3300
Seattle, WA 98104-1610
Telephone: (206) 622-3150
Email: johngoldmark@dwt.com
Email: maryannalmeida@dwt.com

DUNN ISAACSON RHEE LLP

Karen L. Dunn (*pro hac vice*)
William A. Isaacson (*pro hac vice*)
Amy J. Mauser (*pro hac vice*)
Kyle Smith (*pro hac vice*)
401 Ninth Street, NW
Washington, DC 20004-2637
Telephone: (202) 240-2900
E-mail: kdunn@dirllp.com
E-mail: wisaacson@dirllp.com
E-mail: amauser@dirllp.com
E-mail: ksmith@dirllp.com

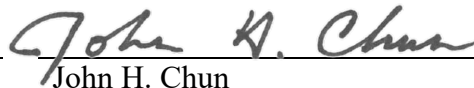
Meredith Dearborn (*pro hac vice*)
345 California Street
Suite 600
San Francisco, CA 94104-2671
Telephone: (202) 240-2900
E-mail: mdearborn@dirllp.com

Attorneys for Amazon.com, Inc.

1 IT IS SO ORDERED.

2
3 July 22, 2025

4 Dated



John H. Chun

United States District Judge